

April 7<sup>th</sup>, 2011

To: Billie Blanchard

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To Whom it May Concern,

Please accept these comments on the Devers-Palo Verde No. 2 Transmission Project Draft Supplemental Environmental Impact Report.

Basin and Range Watch is a group of volunteers who live in the deserts of Nevada and California, working to stop the destruction of our desert homeland. Industrial renewable energy companies are seeking to develop millions of acres of unspoiled habitat in our region. Our goal is to identify the problems of energy sprawl and find solutions that will preserve our natural ecosystems and open spaces.

### **Proposed Action and Alternatives:**

The proposed action is set to help the state of California reach its renewable energy goals and complete the substation connection to interconnect with the tie line for two major approved solar power projects by interconnection agreement target dates. By this time, most target dates have been delayed by permitting and financing problems. Permitting and environmental issues are preventing construction in Arizona. It would appear that this project is being expedited to meet financing goals of energy developers at the expense of the natural and cultural resources in the region.

Every alternative provided in the EIR with the exception of the No Action Alternative would have major direct and/or cumulative impacts on biological resources, cultural resources, water resources and visual resources.

### **Biological Resources:**

#### ***Mojave fringe-toad lizard:***

Basin and Range watch provided scoping comments concerning loss of habitat and sand transport corridors for the Mojave fringe-toed lizard (*Uma scoparia*)

The EIR states that “construction of the proposed, expanded CRS would cause a reduction of sand transported to 1,365 acres downwind of the proposed project area.” and “the resultant deflation would ultimately remove 1,365 acres of MFTL dune habitat.”

Other issues are the spread of invasive weeds and transmission structures attracting subsidized predators such as ravens.

The California Energy Commission has determined that the full development of energy sprawl just in the Chuckwalla Valley region would result in the elimination of 17 percent of all habitat for *Uma scoparia*. The construction and upgrade of new transmission to accommodate this kind of large energy sprawl could cumulatively lead to a Pandora’s Box of large energy projects that could ultimately contribute to large local extinctions of this species. *Uma scoparia* is a California Species of Special Concern. *Uma inornata* is currently listed as Threatened under the Endangered Species Act. The Center for Biological Diversity is petitioning to list the northern clade population of *Uma scoparia* under the Endangered Species Act. The large land rush of renewable projects could cause more potential listings of populations.

### ***Desert Tortoise:***

It is no secret that construction and upgrade of transmission creates perches for ravens that prey on desert tortoise (*Gopherus agassizii*)

The cumulative effects of predation due to upgrading of transmission in the region could impact populations of desert tortoise in the Chuckwalla Desert Wildlife Management Area/ Critical Habitat Unit.

### **Water Resources:**

If you do the math, you can figure out that this project will use over 300 acre feet of water for construction in the first 3 to 18 months. Again, the cumulative scenario needs to be considered. Even though both the Genesis and Blythe projects have gone dry cooled, they both will need 500 to 1,000 acre feet of water each plus hundreds of acre feet just for construction. The Genesis Project has litigation pending over water use. Solar Millennium, the builders of the Blythe Project have admitted that the project will have to be temporarily wet cooled during the hottest times of the year. According to the BLM Final EIS for Blythe, auxiliary cooling towers to remove heat from balance of plant would use 6,034 gallons per minute, for over 8,076 hours/year. Even dry cooled concentrated solar thermal plants are directly and cumulatively water intensive.

### **Cultural Resources:**

The EIR states that 11 cultural sites that are eligible for the National Register will be destroyed. The cumulative scenario of energy sprawl in the region would lead to the destruction of so many cultural resources that tribal elders from both the Chemehuevi and Ft. Mojave Tribe are referring to these plans as “cultural genocide”. The area is indeed rich in cultural resources. Nearly all of

the sites recorded as prehistoric have been described as having potential for subsurface manifestation. In addition to their individual research potential properties, the distribution of many of these sites in conjunction with other prehistoric sites recorded between Desert Center and Blythe may provide links between vestiges of the Coco-Maricopa trail system as well as clues to activities associated with transportation along that route. As such, these sites could be considered as part of a complex archaeological district that would include evidence of trade, travel, interaction among the several cultural groups associated with the area (Cahuilla, Chemehuevi, Mojave, Serrano), resource exploitation along travel routes, seasonality of habitation, and trail spurs between the primary coastal-interior route and the springs and associated rock art sites in the bordering mountain ranges.

### **Visual Resources:**

Basin and Range watch would like to request that the cumulative impacts of energy sprawl on visual resources be analyzed in the final document. Construction of large energy projects will impact view sheds from adjacent wilderness areas and highways. Damage to visual resources also has the potential to impact local economies that have potential for tourism.

### **Conclusion:**

Approval of this project will result in the loss of wildlife habitat and cultural resources on a direct and cumulative basis. It could also have cumulative impacts on both water resources and visual resources. The EIR has not provided an working alternative that will protect or mitigate these resources. At this point, Basin and Range Watch supports the No Action Alternative for this project.

Thank you,

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